



September 24, 2025

VIA ECF

The Hon. Arun Subramanian
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15A
New York, NY 10007

Re: *Jane Doe 3, et al. v. Indyke et al.*, Case No. 24-cv-1204-AS

Dear Judge Subramanian:

Pursuant to Paragraphs 11(C)(ii)-(iii) of Your Honor's Individual Practices in Civil Cases, Plaintiffs Allyson Ward and Jane Doe 3 submit this letter motion to maintain under partial seal Defendants' Letter Response, Dkt. 369, to Plaintiffs' Letter Motion to Compel and Exhibit 1 thereto. The parties met and conferred by telephonic conference on these issues on September 22, 2025. The redactions to Defendants' Response Letter appropriately protect information that would identify potential victims of Epstein. It is Plaintiffs' position that Exhibit 1 only requires partial sealing to protect the identity of the Epstein victim identified therein. Plaintiffs' application is narrowly tailored to protect only sensitive information that would reveal the identities of Epstein's victims.

To start, the Protective Order in this action permits the Parties to designate as Confidential, "any information that could reveal the identity of any actual or alleged victim of abuse of Jeffery E. Epstein who has not been identified publicly, including the victim's name, address, and birthdate." Dkt. 64.

Additionally, courts have granted sealing requests to protect the identities of victims of sex trafficking, including the identities of victims of Jeffrey Epstein. In *Giuffre v. Maxwell*, Judge Preska repeatedly recognized the "gravity of the privacy interests" of "victims of Jeffrey Epstein's abuse." *Giuffre v. Maxwell*, No. 15-CV-7433, Dkts. 1113, 1161. The Court explained that "[t]hose interests are particularly acute given that the psychological and emotional wellbeing of survivors of alleged sexual assaults may be implicated by such a broad disclosure." *Giuffre v. Maxwell*, No. 15-CV-7433, Dkt. 1113. In *Doe I v. JP Morgan Chase Bank, N.A.*, Judge Rakoff found that the privacy interest of a victim of Epstein justified sealing because "[p]rotecting the identity of sexual assault survivors and the details of their assaults is traditionally considered private and has been widely recognized as a compelling reason to limit public access to judicial documents." 742 F. Supp. 3d 387, 397 (S.D.N.Y. 2024) (citations omitted). And recently, in declining to unseal grand jury materials from Epstein's federal criminal case, Judge Berman found that "possible threats to victims' safety and privacy" was a "compelling reason" for denying the Government's request. *See United States v. Epstein*, 1:19-cr-00490-RMB, Dkt. 77 at 8.

Further, any presumption of public access that these documents are entitled to is lessened by the fact that this is an application for discovery. *In re Upper Brook Cos.*, No. 22-MC-97, 2023 WL 172003, at *5 (S.D.N.Y. Jan. 12, 2023).



In light of the foregoing, Plaintiffs respectfully request that the Court grant partial sealing of the Defendants' Response Letter at Dkt. 369 and Exhibit 1 thereto.

Respectfully submitted,

/s/ Sigrid S. McCawley

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